



JAN 20 2015

Mr. Michael Kummer
Hilmar Cheese Company
PO Box 910
Hilmar, CA 95324

Re: Notice of Minor Title V Permit Modification
District Facility # N-1275
Project # N-1143555

Dear Mr. Kummer:

Enclosed is the District's analysis of your application for a minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued Authority-to-Construct permit N-1275-5-7 into the Title V operating permit. The modification is to change the acceptable baghouse differential pressure operating range.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Authority-to-Construct permit N-1275-5-7, emission increases, application, and previous Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

If you have any questions, please contact Mr. Nick Peirce, Permit Services Manager, at (209) 557-6400.

Thank you for your cooperation in this matter.

Sincerely,



Arnaud Marjollet
Director of Permit Services

Enclosures

cc: Gerardo C. Rios, EPA (w/enclosure) via email

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585

TITLE V APPLICATION REVIEW

Minor Modification
Project #: N-1143555

Engineer: Mark Schonhoff
Date: January 15, 2015

Facility Number: N-1275
Facility Name: Hilmar Cheese Company
Mailing Address: PO Box 910
Hilmar, CA 95324

Contact Name: Michael Kummer
Phone: (209) 656-1171

Responsible Official: Jeremy Travis
Title: Vice President, OPS

I. PROPOSAL

Hilmar Cheese Company is proposing a Minor Modification to their Title V permit to incorporate Authority to Construct Permit (ATC) N-1275-5-7 into the current Title V permit. The ATC changes the baghouse pressure differential pressure range to 2 in wc to 8 in wc under normal operating conditions. The ATC was issued without a Certificate of Conformity, therefore, a Title V modification was logged in under N-1275-5-8.

The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with the applicable requirements and to provide the legal and factual basis for the proposed revisions.

II. FACILITY LOCATION

9001 North Lander Avenue
Hilmar, CA

III. EQUIPMENT DESCRIPTION

N-1275-5-7

STEAM-OPERATED VIBRO-FLUIDIZER DRYER SERVED BY A NIRO HUDSON
INC CYCLONE VENTED TO AN AMERICAN AIR FILTER MODEL MILLENNIUM
SIZE 14-336-6304 BAGHOUSE

IV. SCOPE OF EPA AND PUBLIC REVIEW

This change to the Title V permit is considered to be a Minor Modification and, as such, requires no public review.

V. APPLICABLE REQUIREMENTS

District Rule 2520, Federally Mandated Operating Permits (Adopted June 21, 2001)

VI. DESCRIPTION OF PROPOSED MODIFICATIONS

Hilmar Cheese Company received ATC N-1275-5-7, which changes the baghouse differential operating pressure range to 2 in wc to 8 in wc during normal operation. Hilmar Cheese Company is now proposing to incorporate the ATC into the facility Title V permit.

VII. COMPLIANCE

In accordance with Rule 2520, 3.20, these modifications:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include;

- a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
 - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
6. Do not seek to consolidate overlapping applicable requirements.

In accordance with Rule 2520, the application meets the procedural requirements of section 11.4 by including;

1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
2. The source's suggested draft permit; and
3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used.

VIII. ATTACHMENTS

- A. Draft Title V Operating Permit N-1275-5-8
- B. Authority to Construct Permit N-1275-5-7
- C. Current Title V Operating Permit N-1275-5-6
- D. Emissions Increases
- E. Title V Modification – Compliance Certification Form

ATTACHMENT A

**Proposed Modified Title V Operating Permit
N-1275-5-8**

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1275-5-8

EXPIRATION DATE: 09/30/2017

EQUIPMENT DESCRIPTION:

STEAM-OPERATED VIBRO-FLUIDIZER DRYER SERVED BY A NIRO HUDSON INC CYCLONE VENTED TO AN AMERICAN AIR FILTER MODEL MILLENNIUM SIZE 14-336-6304 BAGHOUSE

PERMIT UNIT REQUIREMENTS

1. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
3. Visible emissions from the baghouse serving the lactose drying process shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The facility-wide PM10 emissions shall not exceed 29,200 pounds during any rolling 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
5. PM10 emissions from the baghouse serving the dried lactose process system shall not exceed 0.04 pounds per ton of dried lactose produced. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The amount of dried lactose produced shall not exceed 120 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
7. PM10 emissions shall be calculated as follows: $0.04 \text{ lb/ton-lactose-produced} \times \text{ton-lactose-produced}$. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E=3.59P^{0.62}$ ($P < 30 \text{ tph}$) or $E=17.31P^{0.16}$ ($P > 30 \text{ tph}$). [District Rule 4202] Federally Enforceable Through Title V Permit
9. The baghouse shall be equipped with a pressure differential gauge to indicate the pressure drop across the filters. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The differential pressure gauge reading shall be between 2 and 8 inches of water column during normal baghouse operation. Baghouse service is required when the differential pressure is greater than 8 inches water column. After baghouse service, pressures may be below 2 inches water column until sufficient loading of the filter media has occurred. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Replacement bags numbering at least 10% of the total number of bags shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Material removed from the baghouse shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Differential operating pressure (inches of water column gauge) shall be monitored and recorded on each day that the baghouse operates. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

14. Records of all maintenance of the baghouse, including all change outs of bags or filter media, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
15. The permittee shall keep records of date and quantity of lactose produced. [District Rule 2201] Federally Enforceable Through Title V Permit
16. A record of the facility-wide PM10 emissions, on a rolling 12-month basis shall be kept. The record shall be updated at least monthly. [District Rule 2201] Federally Enforceable Through Title V Permit
17. All records shall be retained for a minimum of five years and made available for District inspection upon request. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

DRAFT

ATTACHMENT B

Authority to Construct Permit
N-1275-5-7



OCT 23 2014

AUTHORITY TO CONSTRUCT

PERMIT NO: N-1275-5-7

ISSUANCE DATE: 10/20/2014

LEGAL OWNER OR OPERATOR: HILMAR CHEESE COMPANY
MAILING ADDRESS: ATTN EHS COORDINATOR

P O BOX 910
HILMAR, CA 95324

LOCATION: 9001 N LANDER AVE
HILMAR, CA 95324

EQUIPMENT DESCRIPTION:

MODIFICATION OF STEAM-OPERATED VIBRO-FLUIDIZER DRYER SERVED BY A NIRO HUDSON INC CYCLONE VENTED TO AN AMERICAN AIR FILTER MODEL MILLENNIUM SIZE 14-336-6304 BAGHOUSE: CHANGE DIFFERENTIAL PRESSURE GAUGE RANGE FROM 2 AND 5 INCHES AT ALL TIMES TO 2 AND 8 INCHES DURING NORMAL BAGHOUSE OPERATION

CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
4. Visible emissions from the baghouse serving the lactose drying process shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The facility-wide PM10 emissions shall not exceed 29,200 pounds during any rolling 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
6. PM10 emissions from the baghouse serving the dried lactose process system shall not exceed 0.04 pounds per ton of dried lactose produced. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The amount of dried lactose produced shall not exceed 120 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

Arnaud Marjollet, Director of Permit Services

N-1275-5-7 Oct 20 2014 7:46AM - FURJODAD Joint Inspection NOT Required

8. PM10 emissions shall be calculated as follows: $0.04 \text{ lb/ton-lactose-produced} \times \text{ton-lactose-produced}$. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E=3.59P^{0.62}$ ($P < 30 \text{ tph}$) or $E=17.31P^{0.16}$ ($P > 30 \text{ tph}$). [District Rule 4202] Federally Enforceable Through Title V Permit
10. The baghouse shall be equipped with a pressure differential gauge to indicate the pressure drop across the filters. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The differential pressure gauge reading shall be between 2 and 8 inches of water column during normal baghouse operation. Baghouse service is required when the differential pressure is greater than 8 inches water column. After baghouse service, pressures may be below 2 inches water column until sufficient loading of the filter media has occurred. [District Rule 2201]
12. Replacement bags numbering at least 10% of the total number of bags shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Material removed from the baghouse shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Differential operating pressure (inches of water column gauge) shall be monitored and recorded on each day that the baghouse operates. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Records of all maintenance of the baghouse, including all change outs of bags or filter media, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The permittee shall keep records of date and quantity of lactose produced. [District Rule 2201] Federally Enforceable Through Title V Permit
17. A record of the facility-wide PM10 emissions, on a rolling 12-month basis shall be kept. The record shall be updated at least monthly. [District Rule 2201] Federally Enforceable Through Title V Permit
18. All records shall be retained for a minimum of five years and made available for District inspection upon request. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit

ATTACHMENT C

Current Title V Permit
N-1275-5-6

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1275-5-6

EXPIRATION DATE: 09/30/2017

EQUIPMENT DESCRIPTION:

STEAM-OPERATED VIBRO-FLUIDIZER DRYER SERVED BY A NIRO HUDSON INC CYCLONE VENTED TO AN AMERICAN AIR FILTER MODEL MILLENNIUM SIZE 14-336-6304 BAGHOUSE

PERMIT UNIT REQUIREMENTS

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6. The amount of dried lactose produced shall not exceed 120 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
7. PM10 emissions shall be calculated as follows: $0.04 \text{ lb/ton-lactose-produced} \times \text{ton-lactose-produced}$. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E=3.59P^{0.62}$ ($P < 30 \text{ tph}$) or $E=17.31P^{0.16}$ ($P > 30 \text{ tph}$). [District Rule 4202] Federally Enforceable Through Title V Permit
9. The baghouse shall be equipped with a pressure differential gauge to indicate the pressure drop across the filters. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The differential pressure gauge reading shall be between 2 and 5 inches of water column at all times the baghouse is in operation. [District Rule 2201] Federally Enforceable Through Title V Permit
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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

15. The permittee shall keep records of date and quantity of lactose produced. [District Rule 2201] Federally Enforceable Through Title V Permit
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17. All records shall be retained for a minimum of five years and made available for District inspection upon request. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

ATTACHMENT C

Emissions Increases

ATC	SSIPE (lb/yr)				
	NO _x	VOC	CO	SO _x	PM ₁₀
N-1275-5-7	0	0	0	0	0
TOTAL	0	0	0	0	0

ATTACHMENT D

Title V Modification – Compliance Certification Form

**San Joaquin Valley
Unified Air Pollution Control District**

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

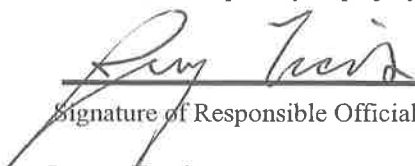
- ☐ SIGNIFICANT PERMIT MODIFICATION ☒ ADMINISTRATIVE
☐ MINOR PERMIT MODIFICATION AMENDMENT

COMPANY NAME: Hilmar Cheese Company, Inc.	FACILITY ID: N - 1275
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: Hilmar Cheese Company, Inc.	
3. Agent to the Owner: Jeremy Travis	

II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial all circles for confirmation):

- ☒ Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).
- ☒ Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- ☒ Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- ☒ Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:



Signature of Responsible Official
Jeremy Travis

10/29/14

Date

Name of Responsible Official (please print)

Vice President, Operations

Title of Responsible Official (please print)